

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE

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DANIEL LOVELACE and  
HELEN LOVELACE, Individually, and as Parents of  
BRETT LOVELACE, deceased,

Plaintiffs,

VS.

NO.: 2:13-cv-02289 dkv       
JURY TRIAL DEMANDED

PEDIATRIC ANESTHESIOLOGISTS, P.A.;  
BABU RAO PAIDIPALLI; and,  
MARK P. CLEMONS, M.D.,

Defendants.

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NOTICE TO TAKE AUDIOVISUAL DEPOSITION OF HELEN LOVELACE

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To: Helen Lovelace  
c/o Mark Ledbetter  
254 Court Avenue, Suite 305  
Memphis, TN 38103

The attorneys for Dr. Mark Clemons, will take the audiovisual deposition of Helen Lovelace on Wednesday, January 15, 2014, at 10:00 a.m. at the office of Mark Ledbetter, 254 Court Avenue, Suite 305, Memphis, TN 38103, upon oral examination pursuant to the Tennessee Rules of Civil Procedure before an officer duly authorized to administer oath.

The deposition shall continue from day to day until completed.

Respectfully submitted,

THOMASON HENDRIX HARVEY  
JOHNSON & MITCHELL, PLLC

By: /s/ Marcy D. Magee  
J. KIMBROUGH JOHNSON (7953)  
MARCY D. MAGEE (19360)  
Attorneys for Defendant, Mark Clemons, M.D.  
40 South Main Street, 29<sup>th</sup> Floor  
Memphis, TN 38103  
(901) 525-8721

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing has been properly served upon all counsel of record identified below via the Court's ECF filing system

Mr. Mark Ledbetter  
Halliburton & Ledbetter  
254 Court Avenue, Suite 305  
Memphis, TN 38103

Mr. David Cook  
Mr. Al McLean  
The Hardison Law Firm  
119 S. Main Street, Suite 800  
Memphis, TN 38103

This the 3rd day of January, 2014.

By: /s/ Marcy D. Magee  
Marcy D. Magee